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22 **NATIONAL RECOVERIES, INC.**

23 **UNITED STATES DISTRICT COURT**
24 **DISTRICT OF NEVADA**

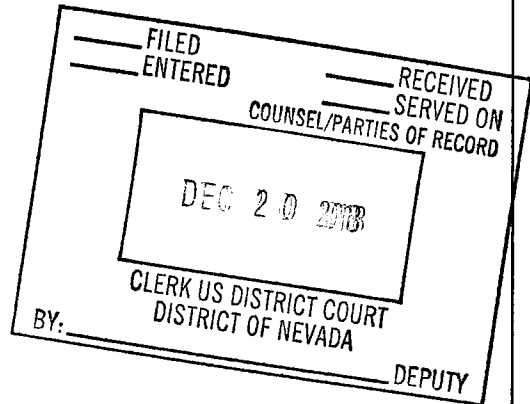
25 **JONNAH GARCIA,**

26 Plaintiff,

27 v.

28 **NAVIENT SOLUTIONS, LLC, a foreign**
limited-liability company; NATIONAL
RECOVERIES, INC., a foreign
corporation; EQUIFAX INFORMATION
SERVICES, LLC, a foreign limited-
liability company; EXPERIAN
INFORMATION SOLUTIONS, INC., a
foreign corporation; TRANS UNION
LLC, a foreign limited-liability company;

Defendants.



Case No. 2:18-cv-02311-RFB-VCF

**STIPULATION TO EXTEND
TIME TO RESPOND TO
COMPLAINT (FIRST
REQUEST)**

ORDER

1 **IT IS HEREBY STIPULATED BY AND BETWEEN** Plaintiff JONNAH
2 GARCIA (“Plaintiff”) and Defendant NATIONAL RECOVERIES, INC,
3 (“Defendant”), and through their respective counsel, as follows:

4 WHEREAS the Complaint which is the subject of this action was served on
5 Defendant on December 8, 2018;

6 WHEREAS Plaintiff and Defendant (hereinafter referred to as “Parties”)
7 have met and conferred and agree good cause exists to extend the deadline for
8 Defendant to respond to Plaintiff’s Complaint to January 18, 2019;

9 WHEREAS Defendant needs additional time to investigate, locate, and
10 assemble the documents relating to Plaintiff’s claims. In addition, Defendant’s
11 counsel will need additional time to review the documents and respond to the
12 allegations in Plaintiff’s Complaint;

13 WHEREAS the additional time to respond to the Complaint will also
14 facilitate possible settlement discussions to resolve this matter without expending
15 unnecessary fees and costs;

16 WHEREAS no previous extension has been requested;

17 WHEREAS the extension of time does not extend the time to respond by
18 more than 30 days;

19 WHEREAS no party claims prejudice as a result of the extension of time;

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1 WHEREFORE, the Parties stipulate and agree that Defendant shall have an
2 extension of time up to and including January 18, 2019 within which to respond to
3 Plaintiff's Complaint.

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5 **IT IS SO STIPULATED.**

6 **LAW OFFICE OF KEVIN L.
7 HERNANDEZ**

8 Dated: December 17, 2018

s/Kevin L. Hernandez

9 Kevin L. Hernandez
10 *Attorney for Plaintiff,*
11 **JONNAH GARCIA**

12 **ALVERSON, TAYLOR, MORTENSEN
& SANDERS**

13 Dated: December 17, 2018

s/Kurt R. Bonds

14 Kurt R. Bonds
15 *Attorney for Defendant,*
16 **NATIONAL RECOVERIES, INC.**

17
18 **IT IS SO ORDERED:**

19 

20
21 **UNITED STATES MAGISTRATE JUDGE**

22
23 DATED: 12/20/18

24
25 **CAM FERENBACH**
26 **U.S. MAGISTRATE JUDGE**